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November 16, 2011

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: Filing of an Executed Amended and Restated Standard Large Generator Interconnection Agreement Among the New York Independent System Operator, Inc., New York State Electric & Gas Corporation, and Howard Wind, LLC, and Request for Waiver of the Commission's Prior Notice Requirement, Docket No. ER12-\_\_\_-000**

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act,<sup>1</sup> Section 35.12 of the Commission's Regulations,<sup>2</sup> and Section 30.11.3 of its Large Facility Interconnection Procedures ("LFIP"), the New York Independent System Operator, Inc. ("NYISO") and New York State Electric & Gas Corporation ("NYSEG") (together, the "Joint Filing Parties") hereby tender for filing an executed Amended and Restated Standard Large Generator Interconnection Agreement ("Amended Agreement") as Service Agreement No. 1702 among the NYISO, NYSEG, and the Developer,<sup>3</sup> Howard Wind, LLC ("Howard Wind"). The Joint Filing Parties respectfully request waiver of the Commission's prior notice requirements to make the Amended Agreement effective as of October 27, 2011.

## **I. Background**

The Amended Agreement supersedes a Large Generator Interconnection Agreement ("LGIA") among the Parties that was filed in Docket No. ER11-2953-000, as Service Agreement No. 1702 ("Original Agreement"). The Original Agreement was accepted by the Commission on April 7, 2011, effective February 11, 2011.

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<sup>1</sup> 16 U.S.C. § 824d (2006).

<sup>2</sup> 18 C.F.R. § 35.12 (2010).

<sup>3</sup> Capitalized terms not otherwise defined in this letter have the meaning set forth in Attachments S and X of the NYISO's Open Access Transmission Tariff ("OATT").

The Original Agreement accepted by the Commission provided for the interconnection of Howard Wind, LLC's 62.5 MW facility ("the Facility") to NYSEG's transmission system. The Original Agreement provided that the Facility would consist of 25, 2.5 MW Clipper N90 double-fed asynchronous generators. The Original Agreement contained non-conforming provisions to recognize operational control issues with respect to the line to which the Facility would interconnect.

## **II. Discussion of Changes**

Since the filing of the Original Agreement, Howard Wind decided to reduce the total generating capacity of the Facility and to change the turbines. Specifically, Howard Wind decided to use 28 Repower MM92 2.05 MW turbines instead of the 25 Clipper 2.5 MW turbines specified in the Original Agreement. This change will reduce the Facility's generating capacity from 62.5 MW to 57.4 MW.

This change was evaluated by the NYISO and determined to be non-material modifications; however, the equipment and Milestones specified in the Original Agreement require modification. The Joint Filing Parties therefore submit this Amended Agreement to reflect the modifications to the Original Agreement.

Specifically, the Amended Agreement modifies the LGIA as follows:

- The body of the Amended Agreement reflects the following modifications to the body of the Original Agreement: (1) a new effective date; (2) changes to reflect that this is the "Amended and Restated" version of the Interconnection Agreement;
- The one-line diagram at Figure A-1 has been updated consistent with the turbine changes and reduction in generating capacity;
- Appendix B reflects updated dates in the Milestone table;
- Appendix C reflects modifications detailing the technical specification of the Repower turbines and the use of such turbines in lieu of the Clipper turbines provided for in the Original Agreement; and
- Appendix F reflects updated contact information for Howard Wind.

The blacklined version attached to this filing shows all of these changes that were made to the currently effective interconnection agreement. The Parties respectfully request that the Commission accept this Amended Agreement.

**III. Effective Date and Request for Waiver of the 60-Day Notice Period**

The parties request an effective date of October 27, 2011 for the Amended Agreement, which is the date of execution. The Commission has allowed interconnection agreements to become effective on the date of execution, even when that date pre-dates the date that an interconnection agreement is filed. Accordingly, the parties request that the Commission grant a waiver of its prior notice requirements to the extent necessary to accommodate this requested effective date.

**IV. Communications and Correspondence**

Communications regarding this filing should be directed to:

**For the NYISO**

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**V. Documents Submitted**

The NYISO submits the following documents:

- this filing letter;
- a clean version of the Amended Agreement (Attachment I); and
- a blackline showing the changes between the Original Agreement and the Amended Agreement (Attachment II).

**VI. Service**

The NYISO will send an electronic link to this filing to the official representative of each of its customers, to each participant on its stakeholder committees, to the New York Public Service Commission, and to the New Jersey Board of Public Utilities. In addition, a complete copy of the Public documents included with this filing will be posted on the NYISO's website at [www.nyiso.com](http://www.nyiso.com).

**VII. Conclusion**

Wherefore, the NYISO respectfully requests that the Commission accept the attached Agreement effective as of October 27, 2011.

Respectfully submitted,

/s/ Sara B. Keegan

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Counsel for the  
New York Independent System Operator, Inc.

/s/ Jeffrey R. Clark

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Counsel for  
New York State Electric & Gas Corporation